

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

SENTILLION, INC.,

Plaintiff

v.

CAREFX CORP.,

Defendant.

Civil Action No.:

JURY TRIAL DEMANDED

COMPLAINT AND JURY DEMAND

1. Plaintiff Sentillion, Inc. ("Sentillion") is a Delaware corporation having its principal place of business at 300 Brickstone Square, Andover, Massachusetts 01810.

2. On information and belief, Defendant Carefx Corporation ("Carefx") is a Delaware corporation having a principal place of business at 8767 East Via de Ventura, Suite 390, Scottsdale, Arizona 85258.

3. This action arises under the patent laws of the United States, Title 35 of the United States Code.

4. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1338(a).

5. Venue in this district is proper pursuant to 28 U.S.C. § 1391(b) and §1400(b).

Count I (Patent Infringement)

6. Sentillion repeats and realleges paragraphs 1-5 above.

7. Sentillion is the owner of United States Patent No. 6,941,313 (the "'313 patent"), issued on September 6, 2005, and has the right to sue on the '313 patent. A copy of the '313 patent is attached as Exhibit A.

8. Defendant Carefx is marketing products covered by one or more claims of the '313 patent.

9. Defendant Carefx has infringed, and is continuing to infringe, the '313 patent by making, selling, offering to sell, and using within the United States products covered by one or more of the claims of the '313 patent.

10. Defendant Carefx is inducing and contributing to infringement by others of the '313 patent, by causing others to make, use, sell, or offer to sell goods covered by the '313 patent within the United States.

11. Upon information and belief, Defendant Carefx's infringement of the '313 patent has been and continues to be willful.

WHEREFORE, Sentillion requests that this Court:

1. enter a preliminary and permanent injunction enjoining Carefx and its affiliates, subsidiaries, officers, directors, employees, agents, representatives, licensees, successors, assigns, and all those acting for any of them or on their behalf, or acting in concert with them, from further infringement of the '313 patent;
2. award Sentillion compensatory damages and its costs and interest;
3. award Sentillion enhanced damages pursuant to 35 U.S.C. § 284;
4. award Sentillion its reasonable attorneys' fees under 35 U.S.C. § 285; and
5. award Sentillion such other relief as the Court deems just and proper.


JURY DEMAND

Sentillion demands a trial by jury on all issues so triable.

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